

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Newport News Division

| | | |
|---------------------------|---|------------------|
| GLEN L. WILSON, |) | |
| |) | |
| Plaintiff |) | |
| |) | |
| v. |) | Civil Action No. |
| |) | |
| THE COLONIAL WILLIAMSBURG |) | |
| FOUNDATION, |) | |
| 301 First Sreet |) | |
| Williamsburg, VA 23185, |) | |
| |) | |
| Serve: |) | |
| |) | |
| Mark P. Hileman |) | |
| Registered Agent |) | |
| 301 First Street |) | |
| Williamsburg, VA 23185 |) | |
| |) | |
| Defendant. |) | |
| |) | |

COMPLAINT

Plaintiff Glen L. Wilson (“Wilson”) brings this action against Defendant The Colonial Williamsburg Foundation (“Foundation”), and for his complaint in this action states as follows:

1. This Court has jurisdiction over this action under 42 U.S.C. § 2000e-5.
2. Defendant operates a living history museum that is engaged in commerce in the historic district in Williamsburg, Virginia, with in excess of 100 employees and those employees received compensation for in excess of 20 weeks in 2018 and 2019.
3. Plaintiff Wilson is a Afro-American male, who began employment as a painter with Defendant on July 27, 2015.
4. On December 5, 2019, Wilson was criminally charged and arrested at a time during which he was not working for Defendant.

5. On December 16, 2019, Defendant suspended Wilson without pay as a result of his arrest.

6. Wilson has not yet been tried for the charges against him.

7. A white male by the name of John Jenkins was also arrested and criminally charged prior to October, 2018.

8. Prior to his conviction, John Jenkins was not suspended without pay like Wilson.

9. The suspension of Wilson without pay, while not suspending John Jenkins under identical circumstances, was the result of a decision by the management of Foundation to discriminate against Wilson because of his race.

10. The management of Foundation discharged Wilson despite either knowing that his discharge would violate legal prohibition on discrimination or being recklessly indifferent to the violation of that prohibition.

11. Wilson has lost compensation as a result of the suspension.

12. Wilson filed a charge of employment discrimination with the Equal Employment Opportunity Commission (“EEOC”) on July 9, 2020, and the EEOC issued a right to sue letter on September 3, 2020.

WHEREFORE Plaintiff Wilson demands judgment against Foundation for \$100,000 in actual and punitive damages plus prejudgment interest and his reasonable attorney's fees and costs incurred in this action.

GLEN L. WILSON
By Counsel

/s/Ernest P. Francis
Ernest P. Francis
VSB#27276
ERNEST P. FRANCIS, LTD.
105 Oronoco Street
Suite 309
Alexandria, VA 22314
(703) 683-8888
Fax (703) 683-8887
E-mail: epfrancis@tristateconsumerlawyer.com

Attorney for Plaintiff

DEMAND FOR JURY TRIAL

Plaintiff demands a jury trial as to all issues triable of right by a jury.

/s/Ernest P. Francis
Ernest P. Francis